

1 District Judge Barbara J. Rothstein  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 TSIGAB A. GEBRAY, *et al.*,  
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11

Plaintiffs,

v.

12 ALEJANDRO MAYORKAS, *et al.*,  
13  
14

Defendants.

Case No. 2:23-cv-00870-BJR

STIPULATED MOTION TO HOLD  
CASE IN ABEYANCE AND ORDER

15 Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal  
16 Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and  
17 move to continue to stay these proceedings through October 18, 2024. Plaintiffs brought this  
18 case pursuant to the Administrative Procedure Act and Mandamus Act seeking an order  
19 compelling the Government to complete processing of Plaintiffs Rahel's, Miriam's, and Sirak's  
20 Form 1-730s, Refugee/Asylee Relative Petitions. This case is currently stayed through  
21 September 18, 2024. Dkt. No. 26, Order. For good cause, the parties request that this case  
22 continue to be stayed through October 18, 2024.

Courts have "broad discretion" to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706  
(1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to

STIPULATED MOTION TO HOLD CASE IN ABEYANCE  
[Case No. 2:23-cv-00870-BJR] - 1

UNITED STATES ATTORNEY  
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1 control the disposition of the causes on its docket with economy of time and effort for itself, for  
2 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R.  
3 Civ. P. 1.

4 With additional time, this litigation should be resolved in its entirety. Since the last  
5 filing, Plaintiff Rahel has arrived in the United States. The United Nations’ International Office  
6 of Migration (“IOM”) is responsible for rescheduling Plaintiffs Sirak’s and Miriam’s travel to  
7 the United States. The Embassy has no role in scheduling travel and does not have information  
8 concerning the status of IOM’s scheduling of their travel.

9 Therefore, the parties believe good cause exists to stay this proceeding through October  
10 18, 2024, to save the parties and the Court from spending unnecessary time and judicial  
11 resources on this matter. Accordingly, the parties jointly stipulate and request that the Court  
12 stay these proceedings through October 18, 2024. The parties will submit a joint status report  
13 on or before October 18, 2024.

14 DATED this 18th day of September, 2024.

15 Respectfully submitted,

16 TESSA M. GORMAN  
United States Attorney

17 s/ Michelle R. Lambert

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22 Attorneys for Defendants

23 ***I certify that this memorandum contains 301  
words, in compliance with the Local Civil  
Rules***

24 STIPULATED MOTION TO HOLD CASE IN ABEYANCE  
[Case No. 2:23-cv-00870-BJR] - 2

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## ORDER

2 The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall  
3 file a joint status report on or before October 18, 2024.

DATED this 19th day of September 2024.

Barbara Rothstein

Barbara Jacobs Rothstein  
U.S. District Court Judge